

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C. 20554

In the Matter of:	)	Wilkes Cellular, Inc.
	)	107 Liberty Street
E911 Phase II Implementation Report	)	Washington GA 30673-0277
	)	
CC Docket No. 94-102	)	TRS Number: 806702
	)	
	)	
	)	

To: Wireless Telecommunications Bureau

**E911 PHASE II INTERIM REPORT AND  
REQUEST FOR LEAVE TO FILE A SECOND INTERIM REPORT  
TO DETERMINE WHETHER WAIVER IS NECESSARY**

Wilkes Cellular, Inc., by its attorney, submit the *Interim Report* required by the Commission's *Order*, 20 FCC Rcd. 7709 (FCC 2005). In response to the Commission's request for interim information, the following is respectfully submitted:

1) Paragraph 86 of the *Order* discusses that Wilkes' need for waiver arises from its transition from analog air interface to a digital air interface.<sup>1</sup> The transition process continues. Wilkes continues to have difficulties with its vendors. The billing system does not work for the digital interface, therefor, Wilkes is unable to offer digital

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<sup>1</sup> Wilkes is deploying a GSM network; the *Order* indicates that Wilkes is deploying a CDMA network. Wilkes regrets if it previously provided any information stating that the system would be CDMA.

service to its subscribers and potential subscribers.<sup>2</sup> The transition process has been underway for nearly two years and while roamers can be handled Wilkes remains unable to add new digital subscribers. Wilkes is currently looking at vendors who might be able to get the radio systems and billing systems functioning properly and continues to prod its current vendors to complete the project, though the current vendors do not seem as responsive as one would think they should be. Because Wilkes is unable to offer digital service to subscribers due to the inaction of necessary third parties, Wilkes hereby requests leave to file a supplemental report by March 1, 2006 to provide updated information to the Commission and, if necessary, the opportunity to request a waiver at that time.<sup>3</sup>

Wilkes received a request for Phase 1 service several months ago, but the requestor has not responded to Wilkes request for information necessary to implement the service. The network equipment necessary for Phase II location service has been installed, but as described above, Wilkes is unable to offer GSM service at this time. Wilkes anticipates that it will be able to offer Phase II service within 180 days of the time that its vendors integrate its GSM radio/billing systems.

Contact person responsible for this supplemental report:

Hill & Welch

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<sup>2</sup> Much to Wilkes' chagrin as you can imagine.

<sup>3</sup> Footnote 217 of the *Order* leaves open the possibility of obtaining a waiver if the circumstances warrant.

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September 1, 2005

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